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7 Attorney for Mary Ellen Martinez

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MARY ELLEN MARTINEZ,

15 Defendant.
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Case No. 2:16-CR-0322-KJD-CWH

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Fourth Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn N.
20 Witt, Assistant Federal Public Defender, counsel for Mary Ellen Martinez, that the Revocation
21 Hearing currently scheduled on November 4, 2022 at 11:30 am, be vacated and continued to a
22 date and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

24 1. Since the last stipulation was filed, defense counsel has conferred with Ms.
25 Martinez and acquired mitigation documents in preparation for the revocation hearing.
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2. Defense counsel has requested additional documentation and needs more time to acquire and review the requested documents.

3. Defense counsel needs additional time to discuss this matter with Ms. Martinez, and prepare for the revocation hearing.

4. Ms. Martinez is in custody and agrees with the need to continue the revocation hearing.

5. The parties agree to the continuance.

This is the fourth request for a continuance of the revocation hearing.

DATED this 2nd day of November, 2022.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Jacquelyn N. Witt
By _____
JACQUELYN N. WITT
Assistant Federal Public Defender

/s/ Jim W. Fang
By _____
JIM W. FANG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MARY ELLEN MARTINEZ,

7 Defendant.
8

Case No. 2:16-CR-0322-KJD-CWH

ORDER

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10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled
11 for Thursday, November 4, 2022 at 11:30 a.m., be vacated and continued to December 7,
12 2022 at the hour of 9:30 a.m.; or to a time and date convenient to the court in courtroom 4A.

13 DATED this 2nd day of November, 2022.

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16 UNITED STATES DISTRICT JUDGE
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